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10 *Attorneys for Defendant*
11 *Gravitas Nevada Ltd. d/b/a The Apothecarium*

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28 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

DANIEL DRAPER, individually and on behalf
of others similarly situated,

Case No.: 2:20-CV-01423-GMN-VCF

Plaintiff,

v.

RHMT, LLC. d/b/a THE APOTHECARIUM,
et al.,

Defendants.

**UNOPPOSED MOTION
FOR EXTENSION OF TIME TO
ANSWER OR OTHER RESPONSIVE
PLEADING ON BEHALF OF
DEFENDANT GRAVITAS NEVADA LTD.
d/b/a THE APOTHECARIUM
AND ORDER**

Defendant Gravitas Nevada Ltd. d/b/a The Apothecarium (“Gravitas”), by and through counsel, moves the court for a fourteen-day extension of time to file an Answer or other responsive pleading to Plaintiffs’ Amended Complaint for Damages and Injunctive Relief Pursuant to the Telephone Consumer Protection Act, 47 U.S.C. § 227 et seq. (“Amended Complaint”) in the above-captioned case. In support of this unopposed Motion, Gravitas states:

1. Gravitas’ current deadline to respond to the Amended Complaint is November 3, 2020.
2. No prior extensions have been sought by, or granted to, Gravitas.

1 3. Gravitas' counsel needs additional time to review and investigate the allegations
2 in the Amended Complaint and attempt to resolve the purported dispute.

3 4. This motion is not made for purposes of hindrance or delay.

4 5. Plaintiff's counsel was consulted and does not oppose this motion for an
5 additional fourteen-day extension for Gravitas to file an Answer or other responsive pleading to
6 the Amended Complaint. If granted, Gravitas will have up to, and including, November 17,
7 2020, to file an Answer or other responsive pleading to the Amended Complaint.

8 WHEREFORE, Defendant Gravitas Nevada Ltd. d/b/a The Apothecarium requests that
9 the Court enter an Order granting this unopposed Motion for an additional fourteen days to file
10 an Answer or other responsive pleading to the Amended Complaint, and for any further relief the
11 Court deems just and proper.

12 Dated: November 3, 2020.

ARMSTRONG TEASDALE LLP

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15 By: /s/ Jeffrey F. Barr
16 JEFFREY F. BARR, ESQ.
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18 3770 Howard Hughes Parkway
 Suite 200
 Las Vegas, NV 89169

19 *Attorneys for Defendant*
20 *Gravitas Nevada Ltd. d/b/a The*
 Apothecarium

21
22 **ORDER**

23 IT IS SO ORDERED.



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25 UNITED STATES MAGISTRATE JUDGE

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28 Dated this 3rd day of November, 2020.

CERTIFICATE OF SERVICE

Pursuant to Fed. R. Civ. P. 5 (b), and section IV of District of Nevada Electronic Filing Procedures, I certify that I am an employee of ARMSTRONG TEASDALE LLP, and that the foregoing Unopposed Motion for Extension of Time to Answer or Other Responsive Pleading on Behalf of Defendant Gravitas Nevada Ltd. d/b/a The Apothecarium and Order was served:

via electronic service to the address(es) shown below:

Gustavo@kazlg.com

Counsel for Plaintiff Daniel Draper and the Putative Class

via the U.S. Postal Service at Las Vegas, Nevada, in a sealed envelope, with first-class postage prepaid, on the date and to the address(es) shown below:

Gustavo Ponce, Esq.
KAZEROUNI LAW GROUP, APC
6069 South Fort Apache Road, Suite 100
Las Vegas, Nevada 89148

Counsel for Plaintiff Daniel Draper and the Putative Class

Date: November 3, 2020.

/s/ Jessica Myrold

An employee of Armstrong Teasdale LLP